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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

TERRY FABRICANT, individually  
and on behalf of all others similarly  
situated,

Plaintiff,

vs.

MFS GLOBAL, INC. d/b/a  
FLOWRICH CAPITAL; and DOES 1  
through 10, inclusive,  
Defendant.

) Case No.

) **CLASS ACTION**

) **COMPLAINT FOR VIOLATIONS  
OF:**

1. NEGLIGENT VIOLATIONS  
OF THE TELEPHONE  
CONSUMER PROTECTION  
ACT [47 U.S.C. §227(b)]
2. WILLFUL VIOLATIONS  
OF THE TELEPHONE  
CONSUMER PROTECTION  
ACT [47 U.S.C. §227(b)]
3. NEGLIGENT VIOLATIONS  
OF THE TELEPHONE  
CONSUMER PROTECTION  
ACT [47 U.S.C. §227(c)]
4. WILLFUL VIOLATIONS  
OF THE TELEPHONE  
CONSUMER PROTECTION  
ACT [47 U.S.C. §227(c)]

) **DEMAND FOR JURY TRIAL**

1 Plaintiff TERRY FABRICANT (“Plaintiff”), individually and on behalf of  
2 all others similarly situated, alleges the following upon information and belief  
3 based upon personal knowledge:

4 **NATURE OF THE CASE**

5 1. Plaintiff brings this action individually and on behalf of all others  
6 similarly situated seeking damages and any other available legal or equitable  
7 remedies resulting from the illegal actions of Defendant MFS GLOBAL, INC.  
8 d/b/a FLOWRICH CAPITAL (“Defendant”), in negligently, knowingly, and/or  
9 willfully contacting Plaintiff on Plaintiff’s cellular telephone in violation of the  
10 Telephone Consumer Protection Act, 47 U.S.C. § 227 *et seq.* (“TCPA”) and related  
11 regulations, specifically the National Do-Not-Call provisions, thereby invading  
12 Plaintiff’s privacy.

13 **JURISDICTION & VENUE**

14 2. Jurisdiction is proper under 28 U.S.C. § 1332(d)(2) because Plaintiff,  
15 a resident of California, seeks relief on behalf of a Class, which will result in at  
16 least one class member belonging to a different state than that of Defendant,  
17 resident of Nevada. Plaintiff also seeks up to \$1,500.00 in damages for each call  
18 in violation of the TCPA, which, when aggregated among a proposed class in the  
19 thousands, exceeds the \$5,000,000.00 threshold for federal court jurisdiction.  
20 Therefore, both diversity jurisdiction and the damages threshold under the Class  
21 Action Fairness Act of 2005 (“CAFA”) are present, and this Court has jurisdiction.

22 3. Venue is proper in the United States District Court for the Central  
23 District of California pursuant to 28 U.S.C. § 1391(b)(2) because Defendant does  
24 business within the State of California and Plaintiff resides within the County of  
25 Los Angeles.

26 **PARTIES**

27 4. Plaintiff, TERRY FABRICANT (“Plaintiff”), is a natural person  
28 residing in Winnetka, California and is a “person” as defined by 47 U.S.C. § 153

1 (39).

2 5. Defendant, MFS GLOBAL, INC. d/b/a FLOWRICH CAPITAL  
3 (“Defendant”), is loan provider, and is a “person” as defined by 47 U.S.C. § 153  
4 (39).

5 6. The above named Defendant, and its subsidiaries and agents, are  
6 collectively referred to as “Defendants.” The true names and capacities of the  
7 Defendants sued herein as DOE DEFENDANT 1 through 10, inclusive, are  
8 currently unknown to Plaintiff, who therefore sues such Defendants by fictitious  
9 names. Each of the Defendants designated herein as a DOE is legally responsible  
10 for the unlawful acts alleged herein. Plaintiff will seek leave of Court to amend the  
11 Complaint to reflect the true names and capacities of the DOE Defendants when  
12 such identities become known.

13 7. Plaintiff is informed and believes that at all relevant times, each and  
14 every Defendant was acting as an agent and/or employee of each of the other  
15 Defendant and was acting within the course and scope of said agency and/or  
16 employment with the full knowledge and consent of each of the other Defendant.  
17 Plaintiff is informed and believes that each of the acts and/or omissions complained  
18 of herein was made known to, and ratified by, each of the other Defendant.

19 **FACTUAL ALLEGATIONS**

20 8. Beginning in or around March of 2017, Defendant contacted Plaintiff  
21 on Plaintiff’s cellular telephone numbers ending in -1083 in an attempt to solicit  
22 Plaintiff to purchase Defendant’s services.

23 9. Defendant contacted or attempted to contact Plaintiff from telephone  
24 number (702) 779- 0245, confirmed to belong to Defendant.

25 10. Defendant used an “automatic telephone dialing system” as defined  
26 by 47 U.S.C. § 227(a)(1) to place its calls to Plaintiff seeking to solicit its services.

27 11. Defendant’s calls constituted calls that were not for emergency  
28 purposes as defined by 47 U.S.C. § 227(b)(1)(A).

1        12. Defendant's calls were placed to telephone number assigned to a  
2 cellular telephone service for which Plaintiff incurs a charge for incoming calls  
3 pursuant to 47 U.S.C. § 227(b)(1).

4        13. Plaintiff is not a customer of Defendant's services and has never  
5 provided any personal information, including his telephone number, to Defendant  
6 for any purpose whatsoever.

7        14. During all relevant times, Defendant did not possess Plaintiff's "prior  
8 express consent" to receive calls using an automatic telephone dialing system or an  
9 artificial or prerecorded voice on its cellular telephones pursuant to 47 U.S.C. §  
10 227(b)(1)(A).

11        15. Furthermore, Plaintiff's cellular telephone number ending in -1083  
12 has been on the National Do-Not-Call Registry well over thirty (30) days prior to  
13 Defendant's initial calls.

14        16. Such calls constitute solicitation calls pursuant to 47 C.F.R. §  
15 64.1200(c)(2) as they were attempts to promote or sell Defendant's services.

16        17. Upon information and belief, and based on Plaintiff's experiences of  
17 being called by Defendant after requesting they stop calling, and at all relevant  
18 times, Defendant failed to establish and implement reasonable practices and  
19 procedures to effectively prevent telephone solicitations in violation of the  
20 regulations prescribed under 47 U.S.C. § 227(c)(5).

21                                    **CLASS ALLEGATIONS**

22        18. Plaintiff brings this action individually and on behalf of all others  
23 similarly situated, as a member the four proposed classes (hereafter, jointly, "The  
24 Classes"). The class concerning the ATDS claim for no prior express consent  
25 (hereafter "The ATDS Class") is defined as follows:

26                    All persons within the United States who received any  
27 solicitation/telemarketing telephone calls from  
28 Defendant to said person's cellular telephone made

1 through the use of any automatic telephone dialing  
2 system or an artificial or prerecorded voice and such  
3 person had not previously consented to receiving such  
4 calls within the four years prior to the filing of this  
Complaint

5 19. The class concerning the ATDS claim for revocation of consent, to the  
6 extent prior consent existed (hereafter “The ATDS Revocation Class”) is defined  
7 as follows:

8  
9 All persons within the United States who received any  
10 solicitation/telemarketing telephone calls from  
11 Defendant to said person’s cellular telephone made  
12 through the use of any automatic telephone dialing  
13 system or an artificial or prerecorded voice and such  
14 person had revoked any prior express consent to receive  
such calls prior to the calls within the four years prior to  
the filing of this Complaint.

15 20. The class concerning the National Do-Not-Call violation (hereafter  
16 “The DNC Class”) is defined as follows:

17  
18 All persons within the United States registered on the  
19 National Do-Not-Call Registry for at least 30 days, who  
20 had not granted Defendant prior express consent nor had  
21 a prior established business relationship, who received  
22 more than one call made by or on behalf of Defendant  
23 that promoted Defendant’s products or services, within  
any twelve-month period, within four years prior to the  
filing of the complaint.

24 21. The class concerning the National Do-Not-Call violation following  
25 revocation of consent and prior business relationship, to the extent they existed  
26 (hereafter “The DNC Revocation Class”) is defined as follows:

27 All persons within the United States registered on the  
28 National Do-Not-Call Registry for at least 30 days, who

1 received more than one call made by or on behalf of  
2 Defendant that promoted Defendant's products or  
3 services, after having revoked consent and any prior  
4 established business relationship, within any twelve-  
5 month period, within four years prior to the filing of the  
6 complaint.

7 22. Plaintiff represents, and is a member of, The ATDS Class, consisting  
8 of all persons within the United States who received any solicitation telephone calls  
9 from Defendant to said person's cellular telephone made through the use of any  
10 automatic telephone dialing system or an artificial or prerecorded voice and such  
11 person had not previously not provided their cellular telephone number to  
12 Defendant within the four years prior to the filing of this Complaint.

13 23. Plaintiff represents, and is a member of, The ATDS Revocation Class,  
14 consisting of all persons within the United States who received any  
15 solicitation/telemarketing telephone calls from Defendant to said person's cellular  
16 telephone made through the use of any automatic telephone dialing system or an  
17 artificial or prerecorded voice and such person had revoked any prior express  
18 consent to receive such calls prior to the calls within the four years prior to the  
19 filing of this Complaint.

20 24. Plaintiff represents, and is a member of, The DNC Class, consisting  
21 of all persons within the United States registered on the National Do-Not-Call  
22 Registry for at least 30 days, who had not granted Defendant prior express consent  
23 nor had a prior established business relationship, who received more than one call  
24 made by or on behalf of Defendant that promoted Defendant's products or services,  
25 within any twelve-month period, within four years prior to the filing of the  
26 complaint.

27 25. Plaintiff represents, and is a member of, The DNC Revocation Class,  
28 consisting of all persons within the United States registered on the National Do-  
Not-Call Registry for at least 30 days, who received more than one call made by or

1 on behalf of Defendant that promoted Defendant's products or services, after  
2 having revoked consent and any prior established business relationship, within any  
3 twelve-month period, within four years prior to the filing of the complaint.

4 26. Defendant, their employees and agents are excluded from The  
5 Classes. Plaintiff does not know the number of members in The Classes, but  
6 believes the Classes members number in the thousands, if not more. Thus, this  
7 matter should be certified as a Class Action to assist in the expeditious litigation of  
8 the matter.

9 27. The Classes are so numerous that the individual joinder of all of its  
10 members is impractical. While the exact number and identities of The Classes  
11 members are unknown to Plaintiff at this time and can only be ascertained through  
12 appropriate discovery, Plaintiff is informed and believes and thereon alleges that  
13 The Classes includes thousands of members. Plaintiff alleges that The Classes  
14 members may be ascertained by the records maintained by Defendant.

15 28. Plaintiff and members of The ATDS Class and The ATDS Revocation  
16 Class were harmed by the acts of Defendant in at least the following ways:  
17 Defendant illegally contacted Plaintiff and ATDS Class members via their cellular  
18 telephones thereby causing Plaintiff and ATDS Class and ATDS Revocation Class  
19 members to incur certain charges or reduced telephone time for which Plaintiff and  
20 ATDS Class and ATDS Revocation Class members had previously paid by having  
21 to retrieve or administer messages left by Defendant during those illegal calls, and  
22 invading the privacy of said Plaintiff and ATDS Class and ATDS Revocation Class  
23 members.

24 29. Common questions of fact and law exist as to all members of The  
25 ATDS Class which predominate over any questions affecting only individual  
26 members of The ATDS Class. These common legal and factual questions, which  
27 do not vary between ATDS Class members, and which may be determined without  
28 reference to the individual circumstances of any ATDS Class members, include,

1 but are not limited to, the following:

- 2 a. Whether, within the four years prior to the filing of this  
3 Complaint, Defendant made any telemarketing/solicitation call  
4 (other than a call made for emergency purposes or made with  
5 the prior express consent of the called party) to a ATDS Class  
6 member using any automatic telephone dialing system or any  
7 artificial or prerecorded voice to any telephone number  
8 assigned to a cellular telephone service;
- 9 b. Whether Plaintiff and the ATDS Class members were damaged  
10 thereby, and the extent of damages for such violation; and
- 11 c. Whether Defendant and their agents should be enjoined from  
12 engaging in such conduct in the future.

13 30. As a person that received numerous telemarketing/solicitation calls  
14 from Defendant using an automatic telephone dialing system or an artificial or  
15 prerecorded voice, without Plaintiff's prior express consent, Plaintiff is asserting  
16 claims that are typical of The ATDS Class.

17 31. Common questions of fact and law exist as to all members of The  
18 ATDS Revocation Class which predominate over any questions affecting only  
19 individual members of The ATDS Revocation Class. These common legal and  
20 factual questions, which do not vary between ATDS Revocation Class members,  
21 and which may be determined without reference to the individual circumstances of  
22 any ATDS Revocation Class members, include, but are not limited to, the  
23 following:

- 24 a. Whether, within the four years prior to the filing of this  
25 Complaint, Defendant made any telemarketing/solicitation call  
26 (other than a call made for emergency purposes or made with  
27 the prior express consent of the called party) to an ATDS  
28 Revocation Class member, who had revoked any prior express

1 consent to be called using an ATDS, using any automatic  
2 telephone dialing system or any artificial or prerecorded voice  
3 to any telephone number assigned to a cellular telephone  
4 service;

5 b. Whether Plaintiff and the ATDS Revocation Class members  
6 were damaged thereby, and the extent of damages for such  
7 violation; and

8 c. Whether Defendant and their agents should be enjoined from  
9 engaging in such conduct in the future.

10 32. As a person that received numerous telemarketing/solicitation calls  
11 from Defendant using an automatic telephone dialing system or an artificial or  
12 prerecorded voice, after Plaintiff had revoked any prior express consent, Plaintiff  
13 is asserting claims that are typical of The ATDS Revocation Class.

14 33. Plaintiff and members of The DNC Class and DNC Revocation Class  
15 were harmed by the acts of Defendant in at least the following ways: Defendant  
16 illegally contacted Plaintiff and DNC Class and DNC Revocation Class members  
17 via their telephones for solicitation purposes, thereby invading the privacy of said  
18 Plaintiff and the DNC Class and DNC Revocation Class members whose telephone  
19 numbers were on the National Do-Not-Call Registry. Plaintiff and the DNC Class  
20 and DNC Revocation Class members were damaged thereby.

21 34. Common questions of fact and law exist as to all members of The  
22 DNC Class which predominate over any questions affecting only individual  
23 members of The DNC Class. These common legal and factual questions, which do  
24 not vary between DNC Class members, and which may be determined without  
25 reference to the individual circumstances of any DNC Class members, include, but  
26 are not limited to, the following:

27 a. Whether, within the four years prior to the filing of this  
28 Complaint, Defendant or its agents placed more than one

1 solicitation call to the members of the DNC Class whose  
2 telephone numbers were on the National Do-Not-Call Registry  
3 and who had not granted prior express consent to Defendant and  
4 did not have an established business relationship with  
5 Defendant;

6 b. Whether Defendant obtained prior express written consent to  
7 place solicitation calls to Plaintiff or the DNC Class members'  
8 telephones;

9 c. Whether Plaintiff and the DNC Class member were damaged  
10 thereby, and the extent of damages for such violation; and

11 d. Whether Defendant and their agents should be enjoined from  
12 engaging in such conduct in the future.

13 35. As a person that received numerous solicitation calls from Defendant  
14 within a 12-month period, who had not granted Defendant prior express consent  
15 and did not have an established business relationship with Defendant, Plaintiff is  
16 asserting claims that are typical of the DNC Class.

17 36. Common questions of fact and law exist as to all members of The  
18 DNC Class which predominate over any questions affecting only individual  
19 members of The DNC Revocation Class. These common legal and factual  
20 questions, which do not vary between DNC Revocation Class members, and which  
21 may be determined without reference to the individual circumstances of any DNC  
22 Revocation Class members, include, but are not limited to, the following:

23 a. Whether, within the four years prior to the filing of this  
24 Complaint, Defendant or its agents placed more than one  
25 solicitation call to the members of the DNC Class whose  
26 telephone numbers were on the National Do-Not-Call Registry  
27 and who had revoked any prior express consent and any  
28 established business relationship with Defendant;

- 1           b.     Whether Plaintiff and the DNC Class member were damaged  
2                 thereby, and the extent of damages for such violation; and  
3           c.     Whether Defendant and their agents should be enjoined from  
4                 engaging in such conduct in the future.

5           37.    As a person that received numerous solicitation calls from Defendant  
6                 within a 12-month period, who, to the extent one existed, had revoked any prior  
7                 express consent and any established business relationship with Defendant, Plaintiff  
8                 is asserting claims that are typical of the DNC Revocation Class.

9           38.    Plaintiff will fairly and adequately protect the interests of the members  
10                of The Classes. Plaintiff has retained attorneys experienced in the prosecution of  
11                class actions.

12           39.    A class action is superior to other available methods of fair and  
13                efficient adjudication of this controversy, since individual litigation of the claims  
14                of all Classes members is impracticable. Even if every Classes member could  
15                afford individual litigation, the court system could not. It would be unduly  
16                burdensome to the courts in which individual litigation of numerous issues would  
17                proceed. Individualized litigation would also present the potential for varying,  
18                inconsistent, or contradictory judgments and would magnify the delay and expense  
19                to all parties and to the court system resulting from multiple trials of the same  
20                complex factual issues. By contrast, the conduct of this action as a class action  
21                presents fewer management difficulties, conserves the resources of the parties and  
22                of the court system, and protects the rights of each Classes member.

23           40.    The prosecution of separate actions by individual Classes members  
24                would create a risk of adjudications with respect to them that would, as a practical  
25                matter, be dispositive of the interests of the other Classes members not parties to  
26                such adjudications or that would substantially impair or impede the ability of such  
27                non-party Class members to protect their interests.

28           41.    Defendant have acted or refused to act in respects generally applicable

1 to The Classes, thereby making appropriate final and injunctive relief with regard  
2 to the members of the Classes as a whole.

3 **FIRST CAUSE OF ACTION**

4 **Negligent Violations of the Telephone Consumer Protection Act**

5 **47 U.S.C. §227(b).**

6 **On Behalf of the ATDS Class and ATDS Revocation Class**

7 42. Plaintiff repeats and incorporates by reference into this cause of action  
8 the allegations set forth above at Paragraphs 1-46.

9 43. The foregoing acts and omissions of Defendant constitute numerous  
10 and multiple negligent violations of the TCPA, including but not limited to each  
11 and every one of the above cited provisions of *47 U.S.C. § 227(b)*, and in particular  
12 *47 U.S.C. § 227 (b)(1)(A)*.

13 44. As a result of Defendant's negligent violations of *47 U.S.C. § 227(b)*,  
14 Plaintiff and the Class Members are entitled an award of \$500.00 in statutory  
15 damages, for each and every violation, pursuant to *47 U.S.C. § 227(b)(3)(B)*.

16 45. Plaintiff and the ATDS Class and ATDS Revocation Class members  
17 are also entitled to and seek injunctive relief prohibiting such conduct in the future.

18 **SECOND CAUSE OF ACTION**

19 **Knowing and/or Willful Violations of the Telephone Consumer Protection**  
20 **Act**

21 **47 U.S.C. §227(b)**

22 **On Behalf of the ATDS Class and the ATDS Revocation Class**

23 46. Plaintiff repeats and incorporates by reference into this cause of action  
24 the allegations set forth above at Paragraphs 1-46.

25 47. The foregoing acts and omissions of Defendant constitute numerous  
26 and multiple knowing and/or willful violations of the TCPA, including but not  
27 limited to each and every one of the above cited provisions of *47 U.S.C. § 227(b)*,  
28 and in particular *47 U.S.C. § 227 (b)(1)(A)*.

48. As a result of Defendant's knowing and/or willful violations of 47 U.S.C. § 227(b), Plaintiff and the ATDS Class and ATDS Revocation Class members are entitled an award of \$1,500.00 in statutory damages, for each and every violation, pursuant to 47 U.S.C. § 227(b)(3)(B) and 47 U.S.C. § 227(b)(3)(C).

49. Plaintiff and the Class members are also entitled to and seek injunctive relief prohibiting such conduct in the future.

### **THIRD CAUSE OF ACTION**

#### **Negligent Violations of the Telephone Consumer Protection Act**

#### **47 U.S.C. §227(c)**

#### **On Behalf of the DNC Class and the DNC Revocation Class**

50. Plaintiff repeats and incorporates by reference into this cause of action the allegations set forth above at Paragraphs 1-46.

51. The foregoing acts and omissions of Defendant constitute numerous and multiple negligent violations of the TCPA, including but not limited to each and every one of the above cited provisions of 47 U.S.C. § 227(c), and in particular 47 U.S.C. § 227 (c)(5).

52. As a result of Defendant's negligent violations of 47 U.S.C. § 227(c), Plaintiff and the DNC Class and DNC Revocation Class Members are entitled an award of \$500.00 in statutory damages, for each and every violation, pursuant to 47 U.S.C. § 227(c)(5)(B).

53. Plaintiff and the DNC Class and DNC Revocation Class members are also entitled to and seek injunctive relief prohibiting such conduct in the future.

### **FOURTH CAUSE OF ACTION**

#### **Knowing and/or Willful Violations of the Telephone Consumer Protection Act**

#### **47 U.S.C. §227 et seq.**

#### **On Behalf of the DNC Class and DNC Revocation Class**

54. Plaintiff repeats and incorporates by reference into this cause of action

1 the allegations set forth above at Paragraphs 1-46.

2 55. The foregoing acts and omissions of Defendant constitute numerous  
3 and multiple knowing and/or willful violations of the TCPA, including but not  
4 limited to each and every one of the above cited provisions of *47 U.S.C. § 227(c)*,  
5 in particular *47 U.S.C. § 227 (c)(5)*.

6 56. As a result of Defendant's knowing and/or willful violations of *47*  
7 *U.S.C. § 227(c)*, Plaintiff and the DNC Class and DNC Revocation Class members  
8 are entitled an award of \$1,500.00 in statutory damages, for each and every  
9 violation, pursuant to *47 U.S.C. § 227(c)(5)*.

10 57. Plaintiff and the DNC Class and DNC Revocation Class members are  
11 also entitled to and seek injunctive relief prohibiting such conduct in the future.

## 12 **PRAYER FOR RELIEF**

13 WHEREFORE, Plaintiff requests judgment against Defendant for the following:

### 14 **FIRST CAUSE OF ACTION**

#### 15 **Negligent Violations of the Telephone Consumer Protection Act**

##### 16 **47 U.S.C. §227(b)**

- 17 • As a result of Defendant's negligent violations of *47 U.S.C.*  
18 *§227(b)(1)*, Plaintiff and the ATDS Class and ATDS Revocation  
19 Class members are entitled to and request \$500 in statutory damages,  
20 for each and every violation, pursuant to *47 U.S.C. 227(b)(3)(B)*.
- 21 • Any and all other relief that the Court deems just and proper.

### 22 **SECOND CAUSE OF ACTION**

#### 23 **Knowing and/or Willful Violations of the Telephone Consumer Protection** 24 **Act**

##### 25 **47 U.S.C. §227(b)**

- 26 • As a result of Defendant's willful and/or knowing violations of *47*  
27 *U.S.C. §227(b)(1)*, Plaintiff and the ATDS Class and ATDS  
28 Revocation Class members are entitled to and request treble damages,

as provided by statute, up to \$1,500, for each and every violation, pursuant to *47 U.S.C. §227(b)(3)(B)* and *47 U.S.C. §227(b)(3)(C)*.

- Any and all other relief that the Court deems just and proper.

### **THIRD CAUSE OF ACTION**

#### **Negligent Violations of the Telephone Consumer Protection Act**

##### **47 U.S.C. §227(c)**

- As a result of Defendant's negligent violations of *47 U.S.C. §227(c)(5)*, Plaintiff and the DNC Class and DNC Revocation Class members are entitled to and request \$500 in statutory damages, for each and every violation, pursuant to *47 U.S.C. 227(c)(5)*.
- Any and all other relief that the Court deems just and proper.

### **FOURTH CAUSE OF ACTION**

#### **Knowing and/or Willful Violations of the Telephone Consumer Protection**

##### **Act**

##### **47 U.S.C. §227(c)**

- As a result of Defendant's willful and/or knowing violations of *47 U.S.C. §227(c)(5)*, Plaintiff and the DNC Class and DNC Revocation Class members are entitled to and request treble damages, as provided by statute, up to \$1,500, for each and every violation, pursuant to *47 U.S.C. §227(c)(5)*.
- Any and all other relief that the Court deems just and proper.

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**JURY DEMAND**

58. Pursuant to the Seventh Amendment to the Constitution of the United States of America, Plaintiff is entitled to, and demands, a trial by jury.

Respectfully Submitted this 23rd Day of May, 2018.

LAW OFFICES OF TODD M. FRIEDMAN, P.C.

By: /s/ Todd M. Friedman

Todd M. Friedman

Law Offices of Todd M. Friedman

Attorney for Plaintiff